

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

NOV 21 1996

In the Matter of)

)
Amendment of Part 25 of the Commission's)
Rules to Establish Rules and Policies)
Pertaining to the Second Processing Round)
of the Non-Voice, Non-Geostationary)
Mobile Satellite Service)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

IB Docket No. 96-220

To: Chief, International Bureau

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JOINT REQUEST FOR EXTENSION OF TIME

The undersigned applicants (the "Applicants")¹ in the above captioned proceeding file this Joint Request for a brief extension of time in which to comply with the comment and other filing requirements established in the Notice of Proposed Rulemaking, FCC 96-426, released October 29, 1996 in the above captioned proceeding (the "NPRM"). Specifically, it is requested that the Commission establish the following revised schedule: comments due December 20, 1996, reply comments due January 13, 1997² and amended applications due January 27, 1997.

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List A B C D E

¹ The Applicants filing this request include second round NVNG MSS applicants CTA Commercial Systems ("CTA"), E-Sat, Inc. ("E-Sat"), Final Analysis Communication Services ("Final Analysis"), GE American Communications, Inc. ("GE Americom"), Orbital Communications Corporation ("Orbcomm"), Starsys Global Positioning, Inc. ("Starsys") and Volunteers in Technical Assistance ("VITA").

² A slight additional extension in the timing for reply comments is needed to ensure adequate time, particularly for the Applicants' technical personnel, to review comments on the Commission's complex system proposals in view of the fact that many staff and advisors may be unavailable over the holiday period.

The Applicants have long advocated that this proceeding should be moved forward as rapidly as possible, and appreciate that the schedule established by the Commission in the NPRM is intended to do just that. However, the Applicants also are concerned that the final result of this proceeding be one that actually facilitates rather than hinders the objectives articulated by the Commission, and shared by the industry, for a competitive Non-voice, Non-geostationary Mobile Satellite Service (NVNG MSS).

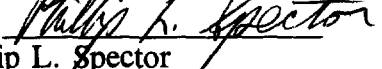
The NPRM proposes technical and licensing approaches which are complex. The auction proposal also raises difficult issues. While the Applicants appreciate that the Commission is doing its best to find a solution to the complex issues posed in this proceeding, initial discussions among the Applicants indicate a willingness to pursue possible industry solutions that may result in the avoidance of mutual exclusivity in the relevant bands. Additional discussions are expected to take place over the next several weeks.

In light of these developments, the brief extension of time requested herein is intended to give the Applicants some additional time to investigate possible solutions and to avoid wasted effort, on the part of both the industry and the FCC staff. It is expected that the Applicants will discuss both the NPRM proposals and alternative approaches. The Applicants believe that the limited time and resources of all concerned may be better spent evaluating proposals that the industry itself finds agreeable, rather than risking further delay with additional challenges to proposals that do not fully satisfy any party and may be strongly objected to by some. The extension of time requested for filing application amendments also would assist the Applicants in formulating more meaningful and realistic amendments in view of all of the comments of the parties to this proceeding.

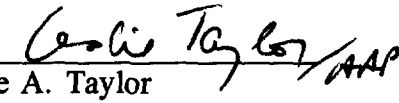
For the reasons stated, the Applicants respectfully ask that the Commission grant the brief extension of time requested.

Respectfully submitted:

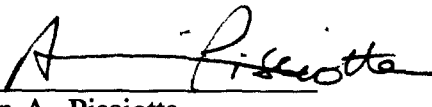
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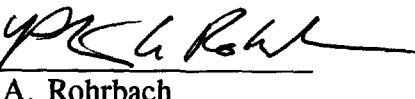
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November 21, 1996

CERTIFICATE OF SERVICE

I, Wanda Borrero-Turner, a legal secretary at Kelley Drye & Warren LLP, hereby certify that on this 22th day of November, 1996, true copies of the foregoing " Joint Extension Of Time " will be sent via first-class U.S. mail, postage prepaid, to:

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